

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**FIRST MONTHLY FEE STATEMENT OF MARTIN, DISIERE, JEFFERSON &
WISDOM, L.L.P. FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AS SPECIAL COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
JANUARY 8, 2023 THROUGH OCTOBER 31, 2023**

Name of Applicant:	Martin, Disiere, Jefferson & Wisdom, L.L.P.	
Applicant's Role in Case:	Special Counsel to Debtor	
Date Order of Appointment Signed:	February 28, 2023 (Dkt #186)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	01/08/2023	10/31/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:		\$172,417.20 ¹ (80% of \$215,521.50)
Total Reimbursable Expenses Requested in this Statement:		\$9,554.50
Summary of Fees for the Period Covered by this Statement		
Professional Fees in this Statement:		\$215,521.50
Total Actual Professional Hours Covered by this Statement:		674.35
Average Hourly Rate for Professionals:		\$319.60

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

¹ Martin, Disiere, Jefferson & Wisdom, L.L.P. is holding \$50,000.00 as a retainer in its Trust Account.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Martin, Disiere, Jefferson & Wisdom, L.L.P. (“MDJW Law Firm”), as special counsel to the Debtor, hereby files its *First Monthly Fee Statement of Martin, Disiere, Jefferson & Wisdom, L.L.P. for Allowance of Compensation for Services Rendered as Special Counsel to the Debtor for the Period from January 8, 2023 through October 31, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, MDJW Law Firm seeks interim payment of \$172,417.20 (80% of \$215,521.50) as compensation for professional services rendered to the Debtor during the period from January 8, 2023 through October 31, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$9,554.50, for a total amount of \$181,971.70 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.²

2. In support of the Monthly Fee Statement, MDJW Law Firm submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Fees by Category as Special Counsel for the Fee Period*, attached as **Exhibit B**, and a *Detailed Record of Fees as Special Counsel for the Fee Period*, attached hereto as **Exhibit C**.

² MDJW has been retained to jointly represent both Debtor and Free Speech Systems, LLC, the debtor in a related chapter 11 (subchapter v) proceeding *In re Free Speech Systems, LLC*, Case No. 22-60043, United States Bankruptcy Court for the Southern District of Texas, Houston Division. As such, all hours, costs and expenses, and fees claimed herein are half of the total amounts invoiced.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, MDJW Law Firm submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. MDJW Law Firm reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, MDJW Law Firm respectfully submits support for its fees in the amount of \$215,521.50 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$9,554.50 for reasonable, actual and necessary expenses incurred during the Fee Period. MDJW Law Firm further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to MDJW Law Firm the amount of \$181,971.70³ which is equal to the sum of 80% of MDJW Law Firm's fees and 100% of MDJW Law Firm's expenses incurred during the Fee Period.

³ Such payment to be made first from any existing retainer funds held by MDJW Law Firm for the Debtor.

Houston, TX

Dated: January 10, 2024.

**MARTIN, DISIERE, JEFFERSON &
WISDOM L.L.P.**

By: /s/ Christopher W. Martin

Christopher W. Martin

808 Travis, Suite 1100

Houston, TX 77002

Telephone: 713-632-1700

Email: martin@mdjwlaw.com

**SPECIAL COUNSEL FOR DEBTOR,
ALEXANDER E. JONES**

CERTIFICATE OF SERVICE

I certify that on January 10, 2024, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Ground Transportation	\$445.68
Lodging/Travel	\$309.58
Litigation support vendors/DocuCopy copy services	\$2,946.40
Filing Fees	\$172.50

EXHIBIT “B”**SUMMARY OF FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	0.00	0.00
B120 Asset Analysis and Recovery	0.00	0.00
B130 Asset Disposition	0.00	0.00
B140 Relief from Stay/Adequate Protection	0.00	0.00
B150 Meetings of & Communications with Creditors	0.00	0.00
B160 Fee/Employment Applications	0.00	0.00
B170 Fee/Employment Objections	0.00	0.00
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	0.00	0.00
B190 Other Contested Matters	563.95	8.65
B195 Non-Working Travel	0.00	0.00
B210 Business Operations	0.00	0.00
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	0.00	0.00
B240 Tax Issues	0.00	0.00
B250 Real Estate	0.00	0.00
B260 Board of Directors Matters	0.00	0.00
B310 Claims Administration and Objections	0.00	0.00
B320 Plan and Disclosure Statement	0.00	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
TOTALS:	665.70	8.65

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD

Martin, Disiere, Jefferson & Wisdom, L.L.P.

ATTORNEYS AT LAW

AUSTIN

115 Wild Basin Rd.
Suite 107
Austin, Texas 78746
Telephone: (512) 610-4400

HOUSTON

808 Travis, Suite 1100
Houston, Texas 77002
Telephone: (713) 632-1700

DALLAS

9111 Cypress Waters Blvd., Suite 250
Dallas, Texas 75019
Telephone: (214) 420-5500

INVOICE COVER SHEET

INVOICE DATE: March 15, 2023

Free Speech Systems/Alex Jones

3143-0002

alexjones1777@gmail.com; areynal@frlaw.us; consultant1@freespeechsystems.com Christopher W. Martin
mhaselden@haseldenfarrow.com; liz@lizfreemanlaw.com; Ha.Nguyen@usdj.gov 248474
vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillpc.com; battagialaw@outlook.com

RE: Jones, Alex/FSS (SEE NOTES)

Total fees	\$58,494.00
Total disbursements	\$667.48
Total Fees & Disbursements	\$59,161.48
Previous balance	\$183,119.77
Less amount received	\$14,652.50
GRAND TOTAL THIS INVOICE	\$227,628.75

Remit to: 808 Travis, Suite 1100, Houston, TX 77002

Please include invoice number on check

Martin, Disiere, Jefferson & Wisdom, L.L.P.

EIN: 76-0627804

Free Speech Systems/Alex Jones

March 15, 2023

alexjones1777@gmail.com; areynal@frlaw.us; consultant1@freespeechsystems.com

Inv. #: 248474

mhaselden@haseldenfarrow.com; liz@lizfreemanlaw.com; Ha.Nguyen@usdoj.gov;

vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillpc.com; rbattaglia@outlook.com

Matter #: 3143-0002**RE:** Jones, Alex/FSS (SEE NOTES)

Date	Description		Hours	Rate	Amount
Feb -01-23	Communicate (with outside counsel) - Multiple communications with Andino regarding plaintiffs' efforts to file the client's confidential text documents in court and make them a matter of public record, and multiple discussions regarding seal orders under Rule 76 including communications with opposing counsel, Bankston.	CWM	0.60	\$425.00	\$255.00
	Draft/revise - Draft and revise our motion to seal under Rule 76.	CWM	1.70	\$425.00	\$722.50
	Research Draft Motion for New Trial.	DOP	8.50	\$295.00	\$2,507.50
	Review/analyze - global record search on any and all state court record pleadings subject to Rule 76 motion to seal record.	LLC	1.20	\$145.00	\$174.00
	Review/analyze - prepare a dozen motions to seal drafts subject to Rule 76 for CWM's evaluation and choices to draw from.	LLC	0.20	\$145.00	\$29.00
Feb -02-23	Communicate (with outside counsel) - Coordination with Andino regarding our draft motion to seal the file	CWM	0.30	\$425.00	\$127.50

in light of yesterday's correspondence with opposing counsel, Bankston.

	Communicate (with outside counsel) - Multiple communications with bankruptcy counsel and Andino regarding confidential records we are seeking to seal in the bankruptcy court to strengthen our confidentiality positions in the state courts in Texas and Connecticut and related discussions of next steps in the Texas litigation.	CWM	0.40	\$425.00	\$170.00
	Plan and prepare for Motion for new trial. Read and review documents provided by client including trial transcripts.	DOP	8.30	\$295.00	\$2,448.50
Feb -03-23	Appear for/attend - Meeting with Andino to discuss multiple status and strategies used.	CWM	1.50	\$425.00	\$637.50
	Draft/revise - Extensive work on the latest draft of our motion for new trial and JNOV motion in preparation for our filing one week from Monday.	CWM	2.70	\$425.00	\$1,147.50
	Research of case law regarding death penalty sanctions and review of hearing transcript.	DOP	2.40	\$295.00	\$708.00
Feb -04-23	Research of cases on media and free speech and media.	DOP	2.70	\$295.00	\$796.50
Feb -05-23	Research and Review of Trial transcripts. Begin Draft of Pleading.	DOP	8.70	\$295.00	\$2,566.50
Feb -06-23	Research and review of trial transcripts and hearing transcripts.	DOP	9.10	\$295.00	\$2,684.50
Feb -07-23	Draft/revise Continued draft of motion for new trial.	DOP	8.50	\$295.00	\$2,507.50
Feb -08-23	Draft/revise , continued review of file and case law. Outline/list of error's committed.	DOP	8.10	\$295.00	\$2,389.50
Feb -09-23	Draft/revise - Extensive revisions to the latest draft of our motion for new trial and JNOV motion including	CWM	2.70	\$425.00	\$1,147.50

provide further drafting instructions to Dave Oppermann.

	Draft/revise Motion for New Trial	DOP	8.60	\$295.00	\$2,537.00
Feb -10-23	Draft/revise Extensive work on the motion for new trial and JNOV motion due Monday including extensive revisions to multiple sections in order to prepare the draft for circulation to the external legal team today.	CWM	5.40	\$425.00	\$2,295.00
	Draft/revise Motion for New Trial	DOP	8.70	\$295.00	\$2,566.50
Feb -11-23	Draft/revise - Extensive revisions to the latest draft of our motion for new trial and JNOV motion including extensive expansion of the due process and 1st amendment issues including extensive research regarding the parameters of US constitutional law for the 1st and 14th amendments and research the punitive damage caps under Texas statutory law including all case law finding it to be constitutional for use in our motion including multiple communications with the drafting team.	CWM	4.30	\$425.00	\$1,827.50
	Draft/revise Motion for New Trial	DOP	15.20	\$295.00	\$4,484.00
Feb -12-23	Draft/revise - Extensive and multiple revisions to the latest draft of our motion for new trial and JNOV motion including extensive revisions to the death penalty sanction section including research additional case law regarding prior reversals of death penalty sanctions on liability issues which are analogous to what the trial court did to Alex here and work extensive case law sections into our briefing including multiple communications with the drafting team.	CWM	4.20	\$425.00	\$1,785.00
	Draft/revise Motion for New Trial	DOP	13.20	\$295.00	\$3,894.00
Feb -13-23	Draft/revise - Multiple additional and final revisions to	CWM	2.60	\$425.00	\$1,105.00

our motion for new trial and JNOV motion in order to finalize same before filing tonight.

	Draft/revise and file Motion for New Trial	DOP	9.50	\$295.00	\$2,802.50
	Review/analyze - examine the latest motion for new trial, or in the alternative, motion to modify judgment received from D. Oppermann, finalize and file directly with the court today.	LLC	0.50	\$145.00	\$72.50
Feb -20-23	Review/analyze Plaintiffs' motion for sanctions and Defendant, E. Traube responses and all exhibits(869 pages) for upcoming hearing.	JLB	5.60	\$245.00	\$1,372.00
Feb -21-23	Review/analyze - Review motions set for hearing on Wednesday in Austin in Fontaine and multiple communications with co-counsel regarding who should attend including extended conversations with Eric Nichols and John LaBoon regarding issues for the hearing in light of arguments made at the November 22nd hearing.	CWM	0.80	\$425.00	\$340.00
	Communicate (with outside counsel) - Multiple communications with bankruptcy counsel regarding the response and retraction regarding the allegedly new defamation on the Piers Morgan show and the response of counsel as well as watch the video apology and retraction disseminated by the client and counsel.	CWM	0.30	\$425.00	\$127.50
	Review/analyze - Receipt and review of four new documents from Plaintiffs' counsel for tomorrow's sanctions hearing and forward to other counsel of record attending the hearing tomorrow with comments on same.	CWM	0.30	\$425.00	\$127.50
	Appear for/attend hearing on Plaintiff's motion for sanctions against attorney, E. Traube.	JLB	4.50	\$245.00	\$1,102.50
Feb -22-23	Review/analyze - Watch the hearing in Austin on sanctions and multiple phone calls before, during and after with Mr. LaBoon and Mr. Nichols regarding arguments made and questions asked during the	CWM	2.50	\$0.00	\$0.00

hearing related to everything testified about today (NO CHARGE).

Feb -24-23	Review/analyze - Receipt and review of threatening e-mail from opposing counsel, Mark Bankston, regarding alleged sanctions concerning our motion for new trial and draft lengthy response scolding him for his inaccurate and grossly unprofessional conduct.	CWM	0.40	\$425.00	\$170.00
Feb -27-23	Communicate (with outside counsel) - Phone call with co-counsel, Andino Reynal, regarding plaintiffs' latest motion and its implication on our motion for new trial.	CWM	0.30	\$425.00	\$127.50
	Communicate (with outside counsel) - Multiple communications with the court and opposing counsel to find days for plaintiffs' most recent motion for sanctions and hearing on our motion for new trial.	CWM	0.30	\$425.00	\$127.50
	Draft/revise - Identify and outline issues for our supplemental motion for new trial based on opportunities created by plaintiffs' latest ridiculous sanction motions and provide additional drafting instructions to Mr. Oppermann regarding same.	CWM	0.60	\$425.00	\$255.00
	Review/analyze - Receipt and review of plaintiffs' latest motion for sanctions against Alex regarding our motion for new trial and outline our response to the motion for sanctions with request for Mr. Oppermann to provide the factual details and support of numerous arguments we're going to make.	CWM	2.70	\$425.00	\$1,147.50
	Review/analyze documents sent by client.	DOP	7.60	\$295.00	\$2,242.00
Feb -28-23	Plan and prepare for - Final preparation for today's hearing with the bankruptcy court including review of all relevant materials to refresh my recollection in the event I'm asked questions today.	CWM	0.80	\$425.00	\$340.00
	Appear for/attend - Hearing with the bankruptcy judge to approve my retention as counsel and make myself available for questions by counsel or the court.	CWM	0.60	\$425.00	\$255.00
	Review/analyze Motion for Sanctions with attachments. Begin response	DOP	12.30	\$295.00	\$3,628.50

Review/analyze Drafting response to Motion for Sanctions.DOP	9.30	\$295.00	\$2,743.50
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Totals**188.70****\$58,494.00****Fee Summary:****Hours****Effective Rate****Amount**

Christopher W. Martin	CWM	36.00	\$395.49	\$14,237.50
Dave Oppermann	DOP	140.70	\$295.00	\$41,506.50
John LaBoon	JLB	10.10	\$245.00	\$2,474.50
Lety Cadena	LLC	1.90	\$145.00	\$275.50

DISBURSEMENTS**Amount**

Feb -13-2023	Court Fees: eFileGov eFile Envelope #72725511, Doc:	\$80.00
Feb -14-2023	Litigation support vendors Alicia DuBois, Court reporter's transcript ASAP from 11/22 hearing	\$530.78
Feb -28-2023	DocuCopy Copy Services	\$56.70

Total Disbursements**\$667.48****Total Fees & Disbursements****\$59,161.48**

Previous Balance

\$183,119.77

Total Receipts

\$14,652.50

Balance Due Now**\$227,628.75**

Martin, Disiere, Jefferson & Wisdom, L.L.P.

ATTORNEYS AT LAW

AUSTIN

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Telephone: (512) 610-4400

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Houston, Texas 77002
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DALLAS

9111 Cypress Waters Blvd., Suite 250
Dallas, Texas 75019
Telephone: (214) 420-5500

INVOICE COVER SHEET

INVOICE DATE: April 18, 2023

Free Speech Systems/Alex Jones

3143-0002

alexjones1777@gmail.com; areynal@frlaw.us; consultant1@freespeechsystems.com Christopher W. Martin

mhaselden@haseldenfarrow.com; liz@lizfreemanlaw.com; Ha.Nguyen@usdj.gov 249806

vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillpc.com; battagialaw@outlook.com

RE: Jones, Alex/FSS (SEE NOTES)

Total fees	\$59,300.00
Total disbursements	\$99.64
Total Fees & Disbursements	\$59,399.64
Previous balance	\$151,975.63
Less amount received	\$19,694.38
GRAND TOTAL THIS INVOICE	\$191,680.89

Remit to: 808 Travis, Suite 1100, Houston, TX 77002

Please include invoice number on check

Martin, Disiere, Jefferson & Wisdom, L.L.P.

EIN: 76-0627804

Free Speech Systems/Alex Jones April 18, 2023
 alexjones1777@gmail.com; areynal@frlaw.us; consultant1@freespeechsystems.com Inv. #: 249806
 mhaselden@haseldenfarrow.com; liz@lizfreemanlaw.com; Ha.Nguyen@usdoj.gov;
 vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillpc.com; rbattaglia@outlook.com

Matter #: 3143-0002

RE: Jones, Alex/FSS (SEE NOTES)

Date	Description		Hours	Rate	Amount
Mar -01-23	Review/analyze response to Motion for Sanctions and Supplemental Motion for New Trial.	DOP	4.30	\$295.00	\$1,268.50
	Review/analyze Heslin plaintiff's motion for sanctions brief JLB and exhibits to same and outline our response.		2.20	\$245.00	\$539.00
Mar -03-23	Review/analyze Continuing my review of file materials with particular attention on Trial Transcripts in order respond from the record for construction of a response to Plaintiffs' latest Motion for Sanctions and document and further analyze arguments we'll be making in appellate brief.	DOP	8.60	\$295.00	\$2,537.00
Mar -04-23	Communicate (with outside counsel) - Multiple communications with bankruptcy counsel and Andino regarding the need for a call on Monday to discuss multiple status and strategy issues.	CWM	0.20	\$425.00	\$85.00
	Review/analyze case law regarding disclosure of jurors and related arguments.	DOP	2.30	\$295.00	\$678.50
Mar -05-23	Review/analyze continued review of Juror disclosure case law and rules, treatises and Law Review, Texas	DOP	3.10	\$295.00	\$914.50

and Louisiana Bar publication for response to the latest Motion for Sanctions.

Mar -06-23	Communicate (with outside counsel) - Conference with CWM Bankruptcy Counsel and Andino Reynal regarding the new proposal regarding the stay of the Texas litigation including the appeal in order to allow further negotiations in the bankruptcy and follow-up discussions with Andino regarding multiple timing and strategy issues.	0.50	\$425.00	\$212.50
	Review/analyze Continuing my review of file materials with particular attention on Trial Transcripts and preparations of footnote bank for arguments mad by plaintiffs in order to respond from the record in our response to plaintiffs' Motion for Sanctions and document and further analyze arguments we'll be making in appellate brief.	DOP 8.30	\$295.00	\$2,448.50
Mar -07-23	Review/analyze Continuing my review Hearing Transcripts and Motions and Orders, Pre trial conference, Unopposed Request for televising the proceedings and continued preparation of FN for insertion in Motion of Sanctions and Brief.	DOP 8.30	\$295.00	\$2,448.50
Mar -08-23	Review/analyze Continuing my review of the proceedings and continued preparation of numerous footnotes for insertion in Motion of Sanctions and Brief.	DOP 8.50	\$295.00	\$2,507.50
Mar -09-23	Review/analyze - Receipt and review of new motion and voluminous exhibits regarding plaintiff's motion for sanctions against Alex Jones and Counsel regarding our motion for new trial and JNOV motion including outline responsive arguments and provide instructions to Mr. Oppermann to supplement our response to the motion for sanctions with numerous objections and arguments.	CWM 1.70	\$425.00	\$722.50
	Review/analyze Continuing my review of Notice of Filing Declaration and continued preparation of numerous footnotes for insertion in Motion of Sanctions and Brief. Review of laws related to Sanctions.	DOP 8.20	\$295.00	\$2,419.00

Mar -10-23	Review/analyze Continuing my review of Court Room Etiquette Articles and continued preparation of numerous footnotes for insertion in Motion of Sanctions and Brief. Review of laws related to Sanctions.	DOP	8.60	\$295.00	\$2,537.00
	Review/analyze plaintiff's declaration on attorney fees and exhibits to same.	JLB	0.60	\$245.00	\$147.00
Mar -11-23	Review/analyze Continuing my review of the proceedings and continued preparation of FN for insertion in Motion of Sanctions and Brief.	DOP	2.00	\$295.00	\$590.00
Mar -12-23	Review/analyze - Review and revise the latest draft of our response to Plaintiff's Motion for Sanctions regarding the Motion for New Trial and provide additional drafting instructions to Mr. Oppermann regarding same.	CWM	1.70	\$425.00	\$722.50
	Review/analyze Continuation of analysis of trial rulings and arguments found in sanctions for filing of Motion for New Trial.	DOP	2.40	\$295.00	\$708.00
Mar -13-23	Review/analyze - Review the bankruptcy court order of March 8th regarding Jones' alleged failure to produce complete financial records in the bankruptcy court and review of the pleadings giving rise to the order in order to compare whether or not there are exposure issues in the Texas civil litigation and the pending motion for sanctions for which we might need to prepare additional responses including coordination with Andino Reynal regarding same.	CWM	1.30	\$425.00	\$552.50
	Review/analyze Continue my review of the complained of Motion for New Trial and related case law regarding identification of error.	DOP	8.70	\$295.00	\$2,566.50
Mar -16-23	Draft/revise - Revise the latest draft of our response to plaintiffs' motion for sanctions and forward comments to Mr. Oppermann for continued drafting.	CWM	0.80	\$425.00	\$340.00
	Communicate (with outside counsel) - Communication with co-counsel regarding our response to plaintiffs' motion for sanctions.	CWM	0.20	\$425.00	\$85.00

Mar -17-23	Draft/revise - Revise the latest draft of our response to the CWM sanctions motions and provide additional draft instructions to Mr. Oppermann to continue refining dozens of arguments made by opposing counsel and working into our response, including provide additional drafting instructions to Mr. Oppermann.	0.70	\$425.00	\$297.50
	Review/analyze Continued my analysis of Jury disclosure and identification during trial and perpetration of Amended Motion for New Trial Complaints in Sanctions Motion	5.60	\$295.00	\$1,652.00
Mar -18-23	Draft/revise - Revisions to latest draft of our response pla CWM in motion for sanctions and coordination with co-counsel regarding questions I had concerning the trial record and make additional suggestions for further drafting by Mr. Oppermann.	1.30	\$425.00	\$552.50
	Draft/revise Response to Motion for Sanctions and continue DOP outline of arguments legally and factually.	5.30	\$295.00	\$1,563.50
Mar -19-23	Communicate (with outside counsel) - Communication CWM with co-counsel regarding our latest draft of our response to the motion for sanctions and provide continued revisions and request for additional drafting for Mr. Oppermann after discussing with co-counsel our initial thoughts to the current draft.	1.20	\$425.00	\$510.00
	Draft/revise Response to Motion for Sanctions and continue DOP outline of arguments legally and factually and adding cites to the record.	6.20	\$295.00	\$1,829.00
Mar -20-23	Draft/revise - Multiple original drafting of and revisions to CWM the latest draft of our response to plaintiffs' motion for sanctions concerning our motion for new trial, including assist with record research and case law citations and provide additional drafting instructions to Mr. Oppermann for the morning and afternoon drafts included multiple communications with Mr. Reynal and Mr. Nichols regarding same.	7.40	\$425.00	\$3,145.00
	Draft/revise Receipt of comments and revision requests DOP from counsel; reorder arguments and add additional arguments; prepared legal arguments related to same.	8.60	\$295.00	\$2,537.00

Mar -21-23	Draft/revise - Extensive additional drafting of new text arguments and extensive revisions to prior draft language in our response to plaintiffs' motion for sanctions concerning the motion for new trial, including extensive record research to locate record citations and legal citations for multiple arguments made in the response including multiple communications with Mr. Reynal and Mr. Nichols concerning additional suggested revisions and arguments and finalized same for filing tonight.	CWM	8.40	\$425.00	\$3,570.00
	Review/analyze Continuing my review of the proceedings and continued preparation of numerous insertions into Response Motion for Sanctions and Brief.	DOP	8.30	\$295.00	\$2,448.50
Mar -22-23	Draft/revise - Outline our response to plaintiffs' attorney fee application. Begin drafting same with request for continued drafting assistance by Mr. Oppermann.	CWM	2.60	\$425.00	\$1,105.00
	Communicate (with outside counsel) - Phone call with Daniel Bitting, counsel for Heslin, regarding the four documents that he is trying to snap-back before Judge Gamble and light up the pending motion for sanctions against his client.	CWM	0.30	\$425.00	\$127.50
	Review/analyze Continuing my review of Motion for Sanctions arguments and responses and continued preparation of FAN for insertion in Motion of Sanctions Response and Brief.	DOP	9.10	\$295.00	\$2,684.50
Mar -23-23	Review/analyze Continuing my review and draft Response to Motion for Sanctions and Draft of Brief for circulation.	DOP	13.40	\$295.00	\$3,953.00
Mar -26-23	Draft/revise Respondent Brief. Prepare and review Cases and check cites of cases and footnotes.	DOP	2.30	\$295.00	\$678.50
Mar -27-23	Draft/revise Continue draft of Respondent Brief. Prepare and review Cases and check cites of cases and footnotes.	DOP	5.10	\$295.00	\$1,504.50
Mar -28-23	Draft/revise Final Response circulated and incorporated additions from counsel; review of final draft and file same.	DOP	11.50	\$295.00	\$3,392.50

Mar -31-23	Communicate (with outside counsel) - Attend extended meeting with co-counsel to prepare for next week's sanctions hearing including extensive work to make sure we're making arguments consistent with the positions in bankruptcy court and begin drafting the PowerPoint presentation for our presentation of arguments before the court.	CWM	6.40	\$425.00	\$2,720.00
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Totals**186.20****\$59,300.00****Fee Summary:**

		Hours	Effective Rate	Amount
Christopher W. Martin	CWM	34.70	\$425.00	\$14,747.50
Dave Oppermann	DOP	148.70	\$295.00	\$43,866.50
John LaBoon	JLB	2.80	\$245.00	\$686.00

DISBURSEMENTS**Amount**

Mar -01-2023	Litigation support vendors Federal Express, Invoice 8-055-41319, Express Saver Delivery to Keri Ward (2/22/23)	\$40.69
Mar -31-2023	DocuCopy Copy Services	\$58.95

Total Disbursements**\$99.64****Total Fees & Disbursements****\$59,399.64**

Previous Balance

\$151,975.63

Total Receipts

\$19,694.38

Balance Due Now**\$191,680.89**

Martin, Disiere, Jefferson & Wisdom, L.L.P.

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DALLAS

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Telephone: (214) 420-5500

INVOICE COVER SHEET

INVOICE DATE: June 9, 2023

Free Speech Systems/Alex Jones

3143-0002

alexjones1777@gmail.com; areynal@frlaw.us; consultant1@freespeechsystems.com Christopher W. Martin
mhaselden@haseldenfarrow.com; liz@lizfreemanlaw.com; Ha.Nguyen@usdj.gov 252799
vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillpc.com; battagialaw@outlook.com

RE: Jones, Alex/FSS (SEE NOTES)

Total fees	\$36,334.00
Total disbursements	\$2,442.06
Total Fees & Disbursements	\$38,776.06
Previous balance	\$191,680.89
Less amount received	\$0.00
GRAND TOTAL THIS INVOICE	\$230,456.95

Remit to: 808 Travis, Suite 1100, Houston, TX 77002

Please include invoice number on check

Martin, Disiere, Jefferson & Wisdom, L.L.P.

EIN: 76-0627804

Free Speech Systems/Alex Jones June 9, 2023
 alexjones1777@gmail.com; areynal@frlaw.us; consultant1@freespeechsystems.com Inv. #: 252799
 mhaselden@haseldenfarrow.com; liz@lizfreemanlaw.com; Ha.Nguyen@usdoj.gov;
 vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillpc.com; rbattaglia@outlook.com

Matter #: 3143-0002

RE: Jones, Alex/FSS (SEE NOTES)

Date	Description	Hours	Rate	Amount
Mar -28-23	Review/analyze - examine two versions of draft response LLC motion for sanctions and motion to strike (1) latest draft edited by Chris Martin (11:00 PM) and (2) draft track changes version from Todd Smith received after 5:00 PM to finalize one final version for filing and serving today.	1.50	\$145.00	\$217.50
Apr -02-23	Plan and prepare for - Begin preparation for Wednesday's CWM hearing on the motion for sanctions against Alex on multiple grounds including begin drafting our PowerPoint of all the arguments I need to make on all the issues and provide additional drafting instructions to Mr. Oppermann regarding same.	2.30	\$425.00	\$977.50
Apr -03-23	Plan and prepare for - Extensive preparation for this week's CWM hearing in Austin including continue preparation of the PowerPoint presentation and outline multiple responsive points to the Reply received from Plaintiffs Counsel over the weekend; revise and finalize our Notice of Appeal to the trial Court and the Court of Appeals; coordination with Co-counsel regarding this week's hearing.	2.60	\$425.00	\$1,105.00
	Review/analyze and prepare Notice of Appeal; review Appelat timetable and calculate and review TRCP 329b(c); continue preparation for hearing on	DOP 9.30	\$295.00	\$2,743.50

Wednesday and Thursday on sanctions motions; prepare materials for hearing and for presentations to the Court.

Review/analyze Heslin Reply on Motion for sanctions and outline reply points for PPT.	DOP	1.20	\$295.00	\$354.00
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Apr -04-23	Appear for/attend - Work on 50+ page PowerPoint for all-day hearing on various sanctions arguments against Alex concerning Defendants Motion for New Trial and other related issues including additional drafting of and extensive revisions to the prior draft from Mr. Opperman including incorporate revisions from Andino Reynal, and three phone calls with Co- counsel to discuss argument refinement and strategic considerations.	CWM	5.30	\$425.00	\$2,252.50
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Appear for/attend - Travel from Houston office to Austin office for tomorrow's all day hearing on plaintiff's most recent motion for sanctions against Alex.	CWM	3.00	\$212.50	\$637.50
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Review/analyze file materials with attention to arguments made by plaintiff's counsel regarding additional grounds for sanctions and related case law; identified cases representative of our position regarding reversible error and Supreme Court precedence that was underbriefed or ignored by the court; reviewed Power point presentation for next two days of hearings on sanctions.	DOP	10.20	\$295.00	\$3,009.00
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Plan and prepare for upcoming hearings on motions for sanctions and attorney's fee including review of Defendant's motion, sanctions motion and reply. (NO CHARGE)	JLB	3.80	\$0.00	\$0.00
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Apr -05-23	Appear for/attend - Attend all-day hearing before the trial court on plaintiff's latest Motion for Sanctions against Alex and Counsel concerning multiple issues including working lunch to prepare for the afternoons direct and cross examinations of live witnesses.	CWM	8.40	\$425.00	\$3,570.00
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Plan and prepare for - Return travel from the Austin courthouse to the Houston office including post hearing debrief with Andino Reynal and discussion of tomorrow's issues with John Laboon to adequately prepare for tomorrow's argument.	CWM	3.00	\$212.50	\$637.50
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	Appear for/attend hearing on Plaintiff's motions for sanctions against Jones and counsel.	JLB	8.40	\$245.00	\$2,058.00
Apr -06-23	Plan and prepare for - Attend lengthy afternoon hearing of Plaintiffs' attorneys fees as a part of its sanctions motions against Alex and argue and argue multiple issues before the trial court.	CWM	3.20	\$425.00	\$1,360.00
	Communicate (with outside counsel) - Return drive from Houston office to Austin Courthouse for today's hearing on Defendants objections to Plaintiffs' attorneys fees as part of its sanction order against Alex Jones including prep coordination with Eric Nichols during the drive.	CWM	3.00	\$212.50	\$637.50
	Communicate (with outside counsel) - Return travel from the Austin courthouse to the Houston office including post hearing debrief with Andino Reynal regarding same.	CWM	3.00	\$212.50	\$637.50
	Appear for/attend hearing on Plaintiff's motion for attorney fees against Jones and counsel.	JLB	3.20	\$245.00	\$784.00
Apr -09-23	Plan and prepare for request for documents necessary for appeal; receipt of Court's record and review and identification of required portions; receipt of proposed Order on Sanctions; receipt of denial of sanctions on April 5, 2023 Motion.	DOP	1.50	\$295.00	\$442.50
Apr -10-23	Communicate (with outside counsel) - Communication with Co-counsel regarding the record for appeal regarding the latest sanction issues in order to verify everything we need to appeal the latest sanction orders are fully supported by the trial court's record and discussion of additional documents to submit regarding the bankruptcy filing serving as the partial basis of the sanctions award against Alex.	CWM	1.70	\$425.00	\$722.50
Apr -11-23	Communicate (with outside counsel) - Meet with Co-counsel to outline the priority of issues for our appellate brief including lengthy discussion of the most recent sanctions issues and how to handle them on appeal either jointly or separately and discussion of items needed for the appellate record not in the trial court's file.	CWM	4.60	\$425.00	\$1,955.00

	Plan and prepare for Request for the record from District Clerk; communication with co-counsel regarding records.	DOP	1.30	\$295.00	\$383.50
Apr -12-23	Review/analyze - Review the trial court record to determine which documents need to be included in the appellate record including follow-up communication with Co-counsel regarding same.	CWM	0.80	\$425.00	\$340.00
Apr -14-23	Additional research confirming the case law concerning the impact of the bankruptcy on the supersedeas bond for Alex including revise and finalize my letter to bankruptcy counsel confirming there is no need for a supersedes bond for Alex.	CWM	1.30	\$425.00	\$552.50
	Review/analyze Conducted analysis of Surety Bond requirement and calculation in a pending bankruptcy; draft correspondence to co-counsel requesting confirmation of same.	DOP	4.50	\$295.00	\$1,327.50
Apr -16-23	Communicate (with outside counsel) - Multiple phone calls and emails with Co-counsel regarding the latest pending motion for sanctions from Plaintiff's Counsel and discussion of next steps regarding the appeal of all prior sanctions orders.	CWM	1.00	\$425.00	\$425.00
Apr -17-23	Communicate (with outside counsel) - Continued phone calls with all prior Counsel of record to obtain complete copies of their file for their representation of Alex and his companies because of the lack of materials across multiple firms to confirm the scope of discovery, answers and documents produced, obtain all communication to and from counsel, obtain all strategy memos to memorialize understanding of the case facts and confirmation of hearing transcripts particularly those conducted electronically during COVID that are not contained in the trial court's file and review multiple documents received from multiple lawyers.	CWM	3.70	\$425.00	\$1,572.50
Apr -18-23	Communicate (with outside counsel) - Additional phone calls with all prior counsel of record to confirm my need to obtain additional copies of their entire file to confirm that I have a complete trial court record. Files were not copied and transferred from each firm as new counsel was retained, or if they were, new counsel lost. Find materials from prior counsel so that	CWM	2.60	\$425.00	\$1,105.00

I can confirm the scope of the appellate record based on discovery answers, pleadings, hearing transcripts, Counsel communication and correspondence, and related materials that have been lost or misfiled among multiple Counsel changes during the life of the file and discussions with each regarding discovery issues giving rise to sanctions motion during each of their tenures in the case.

Apr -19-23	Review/analyze - Continued review of numerous and voluminous file materials to confirm items that need to be in the appellate court record that are not contained in the trial court file including voluminous discovery answers and documents produced in order to establish a more accurate factual record concerning the sanctions order against Alex. Communications between prior Counsel and Plaintiffs Counsel concerning discovery issues and multiple motions where the exhibits were mysteriously separated from the pleading in the trial court file and needs to be supplemented for appeal.	CWM	4.60	\$425.00	\$1,955.00
Apr -20-23	Review/analyze - Continue review of voluminous file materials not contained in the District Court file that are needed on appeal including exhibits to multiple motions not contained in the trial courts file, hearing transcripts from electronic hearings during COVID, letters to the trial court not filed, and discovery answers.	CWM	4.70	\$425.00	\$1,997.50
Apr -21-23	Review/analyze - Work on multiple appellate issues as the impact bankruptcy including bond confirmation, the scope of exhibits being obtained from Travis County trial court, the docketing statement needed by the Court of Appeals and continue verification of materials not contained in the District Court claim file that we need in the appellate record.	CWM	3.20	\$425.00	\$1,360.00
	Review/analyze procedure for procuring documents in Travis County for appeal; exchange emails with clerk regarding identification of all used documents.	DOP	1.20	\$295.00	\$354.00
Apr -26-23	Review/analyze - Receipt and review of the sanction order regarding Andino received from the trial court including multiple discussions with Andino Reynal and Eric Nichols regarding these sanctions awarded by	CWM	1.40	\$425.00	\$595.00

the trial court and discussion of potential appellate grounds.

Apr -27-23	Plan and prepare for additional procedures for procuring new documents in Travis County.	DOP	0.90	\$295.00	\$265.50
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Totals				110.40	\$36,334.00
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Fee Summary:		Hours	Effective Rate	Amount
Christopher W. Martin	CWM	63.40	\$384.78	\$24,395.00
Dave Oppermann	DOP	30.10	\$295.00	\$8,879.50
John LaBoon	JLB	15.40	\$184.55	\$2,842.00
Lety Cadena	LLC	1.50	\$145.00	\$217.50

DISBURSEMENTS		Amount
Mar -31-2023	DocuCopy Copy Services	\$46.20
Apr -05-2023	Out-of-town travel Chris Martin traveled to Austin, TX, to attend the Sanctions Hearing at the Travis County Courthouse., mileage (170.10 @ .655) (4/5/2023)	\$111.42
	Out-of-town travel Chris Martin traveled from Austin, TX, to attend the Sanctions Hearing at the Travis County Courthouse. mileage (170.10 @ .655) (4/5/2023)	\$111.42
Apr -06-2023	Out-of-town travel Chris Martin traveled to Austin, TX, for the 2nd Hearing on the Judge's Decision., mileage (170.10 @ .655)	\$111.42
	Out-of-town travel Chris Martin traveled from Austin, TX, for the 2nd Hearing on the Judge's Decision., mileage (170.10 @ .655)	\$111.42
Apr -10-2023	Out-of-town travel Chris Martin, traveled to Austin, TX to attend All-Counsel Meeting; hotel stay for A. Jones All-Counsel Meeting (4/10/2023)	\$192.21
	Out-of-town travel Chris Martin, traveled to Austin, TX to attend All-Counsel Meeting, mileage, (170.10 @ .655) (4/10/2023)	\$111.42
	Out-of-town travel Chris Martin, traveled from Austin, TX to attend All-counsel Meeting, mileage from Austin, TX (170.10 @ .655) (4/10/2023)	\$111.42
Apr -13-2023	Court Fees: eFileGov eFile Envelope #74630323, Doc: --- No. 03-23-00209-CV Letter to electronically remit	\$205.00
	Litigation support vendors John LaBoon, Parking for attendance at hearings.	\$30.00

Apr -19-2023	Out-of-town travel Chris Martin traveled to Austin, TX., for Hearing on Sanctions (4/5/2023); Lorie Haines paid for overnight hotel stay for Chris Martin due to account changes; hotel	\$234.74
Apr -30-2023	DocuCopy Copy Services	\$53.00
	Litigation support vendors Lorie Haines, payment to Travis County for Certificate Record (5/10/2023)	\$1,012.39
Total Disbursements		\$2,442.06
Total Fees & Disbursements		\$38,776.06
Previous Balance		\$191,680.89
Total Receipts		\$0.00
Balance Due Now		\$230,456.95

Martin, Disiere, Jefferson & Wisdom, L.L.P.

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INVOICE COVER SHEET

INVOICE DATE: June 14, 2023

Free Speech Systems/Alex Jones

3143-0002

alexjones1777@gmail.com; areynal@frlaw.us; consultant1@freespeechsystems.com Christopher W. Martin

mhaselden@haseldenfarrow.com; liz@lizfreemanlaw.com; Ha.Nguyen@usdj.gov 253006

vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillpc.com; battagialaw@outlook.com

RE: Jones, Alex/FSS (SEE NOTES)

Total fees	\$7,580.50
Total disbursements	\$11,340.69
Total Fees & Disbursements	\$18,921.19
Previous balance	\$152,241.14
Less amount received	\$0.00
GRAND TOTAL THIS INVOICE	\$171,162.33

Remit to: 808 Travis, Suite 1100, Houston, TX 77002

Please include invoice number on check

Martin, Disiere, Jefferson & Wisdom, L.L.P.

EIN: 76-0627804

Free Speech Systems/Alex Jones June 14, 2023
 alexjones1777@gmail.com; areynal@frlaw.us; consultant1@freespeechsystems.com Inv. #: 253006
 mhaselden@haseldenfarrow.com; liz@lizfreemanlaw.com; Ha.Nguyen@usdoj.gov;
 vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillpc.com; rbattaglia@outlook.com

Matter #: 3143-0002

RE: Jones, Alex/FSS (SEE NOTES)

Date	Description		Hours	Rate	Amount
May -01-23	Review/analyze Docket sheet and prepare request for record and related tasks. Began identification of items to be requested. Discussion with Court Reporter and records requests from District Clerk.	DOP	0.80	\$295.00	\$236.00
May -02-23	Plan and prepare for Appeal. Contacted Court regarding record, Prepared request for Hearing transcripts and Trial Record	DOP	1.20	\$295.00	\$354.00
May -03-23	Review/analyze - Receipt and review of the four new adversary actions filed in bankruptcy court by the Texas and Connecticut Plaintiffs in order to evaluate how these pleadings impact both the ongoing appeal and ongoing litigation in Texas.	CWM	0.80	\$425.00	\$340.00
May -08-23	Research and confirm documents requested and expected from Court Reporter and Court Clerk. Review of online records and requests.	DOP	2.20	\$295.00	\$649.00
May -10-23	Review/analyze records requested and confirmed. Discussion with counsel regarding Video clips at trial.	DOP	1.30	\$295.00	\$383.50
May -12-23	Draft/revise correspondence to Court Reporter regarding hearing transcripts and confirmation of dates.	DOP	0.80	\$295.00	\$236.00

May -24-23	- Multiple meetings with Co-counsel to discuss multiple issues impacting the appeal, bankruptcy status, sanctions motions and orders against Alex and Counsel, trial status in the other Texas cases and related strategy issues impacting the defense of the Texas cases over the next three months.	CWM	4.70	\$425.00	\$1,997.50
	Research of Bonding Requirements for Bankruptcy and related procedure.	DOP	2.20	\$295.00	\$649.00
	Manage data/files Completed Docket sheet and filed same with Court Of Appeals. Circulated among counsel.	DOP	3.70	\$295.00	\$1,091.50
May -30-23	Communicate (with outside counsel) - Phone call with Co-counsel to discuss the handling of the sanctions motions against Alex and the Counsel and our current notice of appeal and verification that the record compiled by the Travis County clerk included all necessary documents needed to appeal multiple sanction orders.	CWM	1.30	\$425.00	\$552.50
	Research Receipt review and Notate Hearing for Bankruptcy Transcript. Recorded important dates and examine status of possible resolution.	DOP	3.50	\$295.00	\$1,032.50
May -31-23	Research Draft confirmation of payment for record.	DOP	0.20	\$295.00	\$59.00

Totals**22.70****\$7,580.50****Fee Summary:**

		Hours	Effective Rate	Amount
Christopher W. Martin	CWM	6.80	\$425.00	\$2,890.00
Dave Oppermann	DOP	15.90	\$295.00	\$4,690.50

DISBURSEMENTS**Amount**

May -22-2023	Experts Alicia Ann Dubois - Payment for Reporter's Record, Volume 1-24 including exhibits (3143-0002)	\$11,340.69
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Total Disbursements**\$11,340.69**

Total Fees & Disbursements

\$18,921.19

Previous Balance

\$152,241.14

Total Receipts

\$0.00

Balance Due Now

\$171,162.33

Martin, Disiere, Jefferson & Wisdom, L.L.P.

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Telephone: (214) 420-5500

INVOICE COVER SHEET

INVOICE DATE: July 20, 2023

Free Speech Systems/Alex Jones

3143-0002

alexjones1777@gmail.com; areynal@frlaw.us; consultant1@freespeechsystems.com Christopher W. Martin
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RE: Jones, Alex/FSS (SEE NOTES)

Total fees	\$42,125.00
Total disbursements	\$38.46
Total Fees & Disbursements	\$42,163.46
Previous balance	\$171,162.33
Less amount received	\$0.00
GRAND TOTAL THIS INVOICE	\$213,325.79

Remit to: 808 Travis, Suite 1100, Houston, TX 77002

Please include invoice number on check

Martin, Disiere, Jefferson & Wisdom, L.L.P.

EIN: 76-0627804

Free Speech Systems/Alex Jones
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vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillpc.com; rbattaglia@outlook.com

July 20, 2023

Inv. #: 255053

Matter #: 3143-0002

RE: Jones, Alex/FSS (SEE NOTES)

Date	Description	Hours	Rate	Amount
Jun -01-23	Review/analyze of the record contained in the appellant fileDOP	4.30	\$295.00	\$1,268.50
Jun -02-23	Research Begin legal research on applicable sanctions caseCWM law to being drafting the first section of our appellate brief regarding the impropriety of multiple sanctions orders against Alex Jones serving as the cornerstone of our appellate position.	4.50	\$425.00	\$1,912.50
	Manage data/files Review of Documents received by the DOP Court of Appeals for completeness.	7.60	\$295.00	\$2,242.00
Jun -03-23	Draft/revise - Preparation for our appellate brief regardingCWM plaintiffs' excessive attorney fee award with efforts to locate proof within the trial court record indicating the attorney fee award is not supported by contemporaneous and detailed billing records, the fee award was disproportionate and the fee award was inconsistent with Texas Supreme Court case law.	4.60	\$425.00	\$1,955.00
Jun -04-23	Draft/revise - Preparation for our appellate brief regardingCWM the punitive damage cap decisions made in error by the trial court including locate record sites and supporting case law in support of our arguments that the trial court committed reversible error in allowing	4.80	\$425.00	\$2,040.00

plaintiffs post the trial amendment of their pleadings to assert for the first time a cap-busting claim the court erred by falsely assuming the burden of proof standard was met and ignoring the punitive damage cap, the court's decision to not apply the punitive damage cap violated Alex's due process rights under both federal and state law and Plaintiffs failed to obtain individualized findings regarding punitive damages as required by the Texas Supreme Court.

Jun -05-23	Research Continue research of Texas Sanction law to serve as a cornerstone of our appellate brief regarding the inappropriate sanctions against Alex; begin outlining our appellate brief regarding key legal principals violated by the trial court.	CWM	8.40	\$425.00	\$3,570.00
Jun -06-23	Research Continued legal research regarding all Texas case law concerning death penalty sanctions and continue to revise and expand my brief and outline on the sanctions issues against Alex serving as the cornerstone of our appellate brief.	CWM	8.60	\$425.00	\$3,655.00
Jun -07-23	Research Continue research of all Texas Case Law regarding death penalties sanctions and continue to revise and expand our outline of each appellate point we need to make to win the case on this dispositive issue.	CWM	6.30	\$425.00	\$2,677.50
Jun -08-23	Review/analyze Begin reviewing the record of sanction hearings in order to continue to expand and revise our outline of key appellate points regarding errors made by the trial court and opposing counsel in seeking entry of death penalty sanctions.	CWM	4.30	\$425.00	\$1,827.50
Jun -09-23	Review/analyze Continued review of the transcript of all death penalty sanction hearings against Alex to notify errors made by the trial court and opposing counsel for inclusion into our outline of our appellate points regarding the impropriety of death penalty sanctions.	CWM	4.60	\$425.00	\$1,955.00
Jun -12-23	Review/analyze Continue work through the lengthy transcripts of all death penalties sanctions hearings including voluminous exhibits submitted by both sides in order to expand and revise our outline of appellate error arising of the death penalties sanctions and the cornerstone of our appellate defense.	CWM	6.30	\$425.00	\$2,677.50

Jun -13-23	Draft/revise Begin drafting the death penalty sanction portion of our appellate brief including incorporation of all applicable case law and expansion of the issues in our appellate outline of this issue.	CWM	6.30	\$425.00	\$2,677.50
Jun -15-23	Draft/revise Draft Motion for Extension of Time to file appellate brief.	DOP	0.80	\$295.00	\$236.00
Jun -16-23	Communicate (with outside counsel) - Phone call from bankruptcy counsel regarding questions concerning the appeal status and phone call with co-counsel regarding October trial issues being requested by the court coordinator in Travis County.	CWM	0.40	\$425.00	\$170.00
Jun -19-23	Review/analyze - Continue review of the pre trial transcript with particular attention on the multiple discovery hearings predating the death penalty sanction hearing in order to frame the issues needed for our appellate brief due in July including coordination with co-counsel regarding multiple questions from those hearings which predated both of us.	CWM	3.60	\$425.00	\$1,530.00
	Communicate (with outside counsel) Record regarding the incompleteness of the appellate record..	DOP	0.40	\$295.00	\$118.00
	Communicate (with outside counsel) regarding appeal and bonding related case law. (NO CHARGE)	DOP	0.70	\$0.00	\$0.00
Jun -21-23	Communicate (with outside counsel) - Multiple communications with bankruptcy counsel regarding the status in the bankruptcy court and follow-up communication with co-counsel to compare notes regarding the proposed October trial setting and our discovery and prep needs, if any, in order to try the next case.	CWM	1.70	\$425.00	\$722.50
Jun -22-23	Review/analyze - Continuing my review of the trial court record including the most recent sanctions hearing in order to coordinate common appellate points between both of the key sanction hearings in the case concerning Mr. Jones and his counsel and coordination of commonality issues between all of the sanctions hearings in this case and follow-up	CWM	2.30	\$425.00	\$977.50

communication with co-counsel regarding potential omissions from the record by the court reporter.

	Manage data/files continue review of volumes 1-26 of the appellate record.	DOP	7.00	\$295.00	\$2,065.00
Jun -23-23	Review/analyze - Continue my review of the trial transcript with particular attention on the hearings on death penalty sanctions in order to prioritize key issues for our appellate brief due in July Including follow-up communication with co-counsel regarding questions I have concerning exhibits and comments from the trial court.	CWM	4.20	\$425.00	\$1,785.00
	Manage data/files Continue to review volumes 1-26 filed in the appellant record for record cites for our appeal.	DOP	6.50	\$295.00	\$1,917.50
Jun -28-23	Communicate (with outside counsel) - Communication with co-counsel regarding appellate issues for our brief in July including our request for an extension of time to file our reply brief and outline same for Mr. Oppermann to complete.	CWM	0.80	\$425.00	\$340.00
Jun -29-23	Manage data/files Review of Appellant record for completeness.	DOP	6.60	\$295.00	\$1,947.00
Jun -30-23	Manage data/files in response to confirmation request. Continue to review documents in volumes 1-26 of the appellate record.	DOP	6.30	\$295.00	\$1,858.50

Totals**111.90****\$42,125.00****Fee Summary:**

		Hours	Effective Rate	Amount
Christopher W. Martin	CWM	71.70	\$425.00	\$30,472.50
Dave Oppermann	DOP	40.20	\$289.86	\$11,652.50

DISBURSEMENTS

Jun -01-2023	Litigation support vendors Federal Express, Invoice 8-156-05231, Priority Overnight Delivery to Alicia DuBois	\$38.46
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Total Disbursements**\$38.46**

Total Fees & Disbursements

\$42,163.46

Previous Balance

\$171,162.33

Total Receipts

\$0.00

Balance Due Now

\$213,325.79

Martin, Disiere, Jefferson & Wisdom, L.L.P.

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Telephone: (214) 420-5500

INVOICE COVER SHEET

INVOICE DATE: August 17, 2023

Free Speech Systems/Alex Jones

3143-0002

alexjones1777@gmail.com; areynal@frlaw.us; consultant1@freespeechsystems.com Christopher W. Martin

mhaselden@haseldenfarrow.com; liz@lizfreemanlaw.com; Ha.Nguyen@usdj.gov 255919

vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillpc.com; battagialaw@outlook.com

RE: Jones, Alex/FSS (SEE NOTES)

Total fees	\$26,310.50
Total disbursements	\$1,896.10
Total Fees & Disbursements	\$28,206.60
Previous balance	\$213,325.79
Less amount received	\$0.00
GRAND TOTAL THIS INVOICE	\$241,532.39

Remit to: 808 Travis, Suite 1100, Houston, TX 77002

Please include invoice number on check

Martin, Disiere, Jefferson & Wisdom, L.L.P.

EIN: 76-0627804

Free Speech Systems/Alex Jones August 17, 2023
 alexjones1777@gmail.com; areynal@frlaw.us; consultant1@freespeechsystems.com Inv. #: 255919
 mhaselden@haseldenfarrow.com; liz@lizfreemanlaw.com; Ha.Nguyen@usdoj.gov;
 vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillpc.com; rbattaglia@outlook.com

Matter #: 3143-0002

RE: Jones, Alex/FSS (SEE NOTES)

Date	Description	Hours	Rate	Amount
Jul -01-23	Review/analyze receipt and review and respond to a series of DOP of correspondences from Court Reporter regarding the whereabouts of the transcripts in several Hearings. Respond to same. Draft letter to other Court Reporter requesting clarification.	1.40	\$295.00	\$413.00
Jul -03-23	Research Court of Appeals Records to determine if Exhibits DOP or Transcripts are missing.	6.40	\$295.00	\$1,888.00
Jul -04-23	Research of Appellat file to determine if record is complete DOP Identify Hearings and compare to Hearing and trial Transcripts filed in the COA Draft a request for remaing Hearing Transcripts and identify by date and time.	4.50	\$295.00	\$1,327.50
Jul -05-23	Communicate (with outside counsel) - Video conference CWM with bankruptcy counsel and Andino Reynal to discuss multiple status and strategy issues impacting the October trial setting in Posner.	0.50	\$425.00	\$212.50
	Communicate (with outside counsel) - Locate multiple CWM documents and data requested earlier today by bankruptcy counsel and forward same relating to the appeal in Heslin and the upcoming trial in Posner.	0.80	\$425.00	\$340.00

	Review/analyze - Review the file materials in Posner to prepare for answering questions from bankruptcy counsel in our video call of this morning to discuss multiple issues in light of the timing of different issues in bankruptcy court.	CWM	0.40	\$425.00	\$170.00
	Research of Appeals file and identify from Hearings and trial Records Exhibits and deposition transcripts identified at trial Create list and compare with what has been filed.	DOP	4.30	\$295.00	\$1,268.50
Jul -06-23	Review/analyze Receipt review and respond to correspondence from Court Reporter regarding additional Court Reporters involved in case.	DOP	0.30	\$295.00	\$88.50
	Review/analyze Preparation and attendance of meeting with attorneys involved in appeals Martin and Reynals to discuss state of filing.	DOP	0.70	\$295.00	\$206.50
	Research of Exhibits contained in Court Record and compare with actual records	DOP	3.80	\$295.00	\$1,121.00
	Review/analyze - attend brief meeting with Martin and Andino Reynal regarding trial preparation needs regarding the Pozner litigation. (no charge)	LLC	0.10	\$0.00	\$0.00
Jul -07-23	Review/analyze - Work through multiple volumes of the trial transcript to locate trial court rulings enforcing death penalty sanctions against Alex in terms of limiting our ability to present relevant evidence or allowing Plaintiffs' lawyers to introduce evidence which we cannot rebut given the enforcement of sanctions in order to obtain the necessary record cites for our appellate brief regarding death penalty sanctions against Alex, the cornerstone of the of the appellate defense.	CWM	6.20	\$425.00	\$2,635.00
	Research review records and prepare requests for remaining record. Draft letters to COA requesting Extension and letters to Clerk and	DOP	5.20	\$295.00	\$1,534.00
Jul -10-23	Review/analyze - Continue review of multiple volumes of the trial transcript for additional record citations to every instance at trial when the death penalty sanctions orders were enforced against Alex to prevent the introduction of critical evidence and allowing Plaintiff Counsel to introduce prejudicial	CWM	6.20	\$425.00	\$2,635.00

evidence which we could not adequately rebut in light of the sanctions order including notate and annotate all for our appellate brief on the death penalty sanctions issue.

	Draft/revise Receipt review and respond to request for status from co counsel.	DOP	0.50	\$295.00	\$147.50
	Review/analyze Receipt of non opposition.	DOP	0.10	\$295.00	\$29.50
	Draft/revise Motion for Extension of Time to file Brief. Review of Martin's calendar to include in Motion.	DOP	2.20	\$295.00	\$649.00
	Draft/revise correspondence to opposing counsel for Certificate of Conference.	DOP	0.20	\$295.00	\$59.00
	Draft/revise correspondence to counsel regarding opposition to Motion to extend time.	DOP	0.30	\$295.00	\$88.50
	Draft/revise Motion to Abate and in the alternative Motion to Enlarge Time to file Appellant Brief.	DOP	3.00	\$295.00	\$885.00
Jul -11-23	Draft/revise Continued draft of Motion for Extension of Time to File Brief.	DOP	1.40	\$295.00	\$413.00
	Review/analyze Receipt of Video Evidence presented at trial from the COA. Begin to review same for completeness. Draft Motion for extension of time and file same	DOP	6.50	\$295.00	\$1,917.50
Jul -12-23	Research Teleconference with clerk regarding missing records.	DOP	0.40	\$295.00	\$118.00
Jul -13-23	Review/analyze Receipt and review of correspondence regarding requested records from the Court Reporter.	DOP	0.20	\$295.00	\$59.00
	Review/analyze - begin examination of the Pozner court record from April 2018 to December 2018 (over 61 PDF images) to prepare this case for trial needs in	LLC	2.00	\$145.00	\$290.00

October, including examine list of documents under the record (25 pages of documents) for accuracy.

Communicate (with outside counsel) - contact the clerk to obtain permission for Attorney Chris Martin to have access to the court's entire file as counsel in this case for the Defendants for trial preparation in October including fill out forms necessary to get access to the record.	LLC	0.30	\$145.00	\$43.50
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Review/analyze - continue examination of the Pozner court record from January 2019 to December 2020 to continue preparing our record for trial in October, including continue examination of the list of documents under the record for accuracy.	LLC	0.60	\$145.00	\$87.00
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Review/analyze - continue examination of the Pozner court record from January 2021 to December 2021 (over 75 PDF images) to continue preparing our records for trial in October, including continue examination of the list of documents under the record for accuracy.	LLC	3.00	\$145.00	\$435.00
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Review/analyze - continue examination of the Pozner court record from January 2022 to December 2022 (over 75 PDF images) to continue preparing our records for trial in October, including examine list of documents under the record (25 pages of documents) for accuracy of the record.	LLC	3.10	\$145.00	\$449.50
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Jul -14-23	Draft/revise correspondence to Court Clerk requesting missing documents. Receipt of response. Research of party responsible to provide documents and Court Reporter Records. Drafted response to Official Court Reporter.	DOP	2.30	\$295.00	\$678.50
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Jul -16-23	Communicate (with outside counsel) - Phone call with bankruptcy counsel Vicky Driver to discuss multiple questions Alex had, discuss multiple status and strategy issues, and set up a video call with Alex for later this week.	CWM	0.50	\$425.00	\$212.50
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Communicate (with outside counsel) - Multiple phone calls with bankruptcy counsel to set up a conference call for today to discuss multiple Alex Jones issues and ask questions regarding certain status issues.	CWM	0.40	\$425.00	\$170.00
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Jul -17-23	Draft/revise - Revisions to the latest draft of our motion to CWM abate the appeal pending the completion of the supplementation of the appellate record by the trial court clerk and make additional drafting suggestions to Mr. Oppermann for incorporation into the latest draft of the motion.	1.40	\$425.00	\$595.00
Jul -19-23	Review/analyze - Notate and annotate the trial testimony of CWM Alex Jones with respect to every issue where the sanctions order precluded him from offering favorable testimony in his defense or allowed prejudicial cross examination by Plaintiffs Counsel on issues which we could not rebut in order to obtain all record sites needed for our appellate brief on the death penalty sanctions issue.	4.50	\$425.00	\$1,912.50
	Communicate (with client) - Conference call with Alex, CWM Norm and Vickie to discuss multiple status and strategy issues regarding the appeal, Andino, the October trial setting, the Texas appeal and related status and strategy questions.	0.50	\$425.00	\$212.50
Jul -24-23	Draft/revise correspondence to Court Clerk regarding DOP missing Exhibits.	0.30	\$295.00	\$88.50
	Draft/revise correspondences to Court Reporter requesting DOP missing transcripts be filed with the COA.	0.50	\$295.00	\$147.50
Jul -25-23	Communicate (with outside counsel) - Meeting with CWM co-counsel to discuss multiple issues pertaining to the upcoming trial in October in Austin arguments for the appeal, the appellate record, status of ongoing settlement negotiations, multiple bankruptcy issues and related litigation management discussion.	2.80	\$425.00	\$1,190.00
	Review/analyze Prepare Exhibits for brief. Draft Brief to DOP identify.	0.60	\$295.00	\$177.00
Jul -26-23	Communicate (in firm) Consult with Appellant section DOP regarding Motion to Transfer. Make suggested additions to Motion. Circulate Motion to all counsel for review.	2.20	\$295.00	\$649.00
	Draft/revise correspondence to Court Reporter re copy of DOP check, request and tracking number.	0.30	\$295.00	\$88.50

Jul -27-23	Review/analyze Receipt of confirmation of filing of Reporter's record.	DOP	0.20	\$295.00	\$59.00
Jul -28-23	Review/analyze Receipt of confirmation from the COA that the Court Reporter's Record has been supplemented.	DOP	0.30	\$295.00	\$88.50
	Review/analyze Receipt of confirmation of filing in Appellant Record.	DOP	0.20	\$295.00	\$59.00
	Receipt and review of comments from co counsel regarding Motion to Transfer. Draft changes to Motion to Transfer.	DOP	0.80	\$295.00	\$236.00
Jul -29-23	Review/analyze Receipt review and respond to correspondences from Reynal regarding effect of proposed Motion and the recent filing of the reporter's record on the date the brief is due.	DOP	0.50	\$295.00	\$147.50
Jul -31-23	Review/analyze Drafted correspondence to Court Clerk requesting Exhibits be filed and Bill of Costs.	DOP	0.30	\$295.00	\$88.50

Totals**83.20****\$26,310.50****Fee Summary:**

		Hours	Effective Rate	Amount
Christopher W. Martin	CWM	24.20	\$425.00	\$10,285.00
Dave Oppermann	DOP	49.90	\$295.00	\$14,720.50
Lety Cadena	LLC	9.10	\$143.41	\$1,305.00

DISBURSEMENTS

		Amount
Jul -01-2023	Litigation support vendors Susan Poodiack, Supplemental Clerk Records (8/1/2023)	\$12.80
Jul -12-2023	Court Fees: eFileGov eFile Envelope #77439954, Doc: Unopposed Motion for Extension of Time to File Appellan	\$10.00
Jul -25-2023	Litigation support vendors Chavela Crain, Payment of Supplemental records for 8/30/18 and 10/03/19	\$536.50
Jul -31-2023	DocuCopy Copy Services	\$1,336.80
Total Disbursements		\$1,896.10

Total Fees & Disbursements

\$28,206.60

Previous Balance

\$213,325.79

Total Receipts

\$0.00

Balance Due Now

\$241,532.39

Martin, Disiere, Jefferson & Wisdom, L.L.P.

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INVOICE COVER SHEET**INVOICE DATE: October 24, 2023****FOR PERIOD THROUGH: September 30, 2023**

Free Speech Systems/Alex Jones

alexjones1777@gmail.com; areynal@firlaw.us; consultant1@freespeechsystems.com; Christopher W. Martin

mhaselden@haseldenfarrow.com; liz@lizfreemanlaw.com; Ha.Nguyen@usdoj.gov;

vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillp26027battagliaalaw@outlook.com, c

3143-0002

RE: Jones, Alex/FSS (SEE NOTES)

Total fees	\$66,000.00
Total disbursements	\$1,261.77
Total Fees & Disbursements	\$67,261.77
Previous balance	\$315,482.52
Less amount received	\$0.00.
Retainer Used.....	\$0.00
Retainer Balance.....	\$0.00
GRAND TOTAL THIS INVOICE	\$382,744.29

Remit to: 808 Travis, Suite 1100, Houston, TX 77002

Please include invoice number on check

Martin, Disiere, Jefferson & Wisdom, L.L.P.
 EIN: 76-0627804

Free Speech Systems/Alex Jones
 alexjones1777@gmail.com; areynal@firlaw.us; consultant1@freespeechsystems.com
 mhaselden@haseldenfarrow.com; liz@lizfreemanlaw.com; Ha.Nguyen@usdoj.gov;
 vickie.driver@crowedunlevy.com; sjordan@jhwclaw.com; patrick@magillpc.com; rbattaglia@outlook.com, elisa.w

October 24, 2023

Inv. #: 260227

Matter #: 3143-0002 For Services through September 30, 2023

RE: Jones, Alex/FSS (SEE NOTES)

Date	Description	Hours	Rate	Amount
Sep -01-23	Draft/revise - Additional drafting of our appellate brief CWM regarding death penalty sanctions with particular attention to the factual portion of the brief regarding the discovery record and compliance, the failure of the trial court to consider lesser sanctions, the culpability of Counsel rather than the client regarding discovery issues and the inconsistent rulings of the trial court regarding what the Plaintiffs were allowed to introduce as opposed to what Alex was allowed to introduce in his defense regarding the alleged damage claims and the corresponding violation of Texas law in multiple respects.	3.30	\$425.00	\$1,402.50
	Draft/revise Draft Summary of pleadings history and review of the Two Court of Appeals finding for evidence of Res Judicata. Draft Statement of the Case.	DOP 8.20	\$295.00	\$2,419.00
Sep -04-23	Draft/revise Review of records and begin draft of Issues presented and applicable case law emphasis on State Court Rulings.	DOP 7.90	\$295.00	\$2,330.50
Sep -05-23	Draft/revise Continued draft of Death Penalty issues and defamation cases weighing to freedom of speech v. client rights.	DOP 8.40	\$295.00	\$2,478.00

Sep -06-23	Draft/revise Lafferty file and compare to allegations made by plaintiffs and their lawyers in pleadings and in Death Penalty Sanction.	DOP	8.10	\$295.00	\$2,389.50
Sep -07-23	Draft/revise - Additional drafting of our appellate brief regarding death penalty sanctions including revisions to the First Amendment argument and revisions to the Supreme Court case law regarding death penalty sanctions arguments in order to establish the legal objections to the death penalty sanctions entered here.	CWM	3.60	\$425.00	\$1,530.00
	Draft/revise Research and drafting regarding the Sua Sponte declarations and Post Trial amendments met the legal requirements.	DOP	9.20	\$295.00	\$2,714.00
Sep -08-23	Draft/revise Argument and Authorities. Review of cites and revise brief.	DOP	8.70	\$295.00	\$2,566.50
Sep -11-23	Draft/revise Brief. Review Info Wars depositions and evidence of other depositions.	DOP	8.40	\$295.00	\$2,478.00
Sep -12-23	Draft/revise Review of brief for argument and authorities and organize arguments.	DOP	8.40	\$295.00	\$2,478.00
Sep -13-23	Communicate (with outside counsel) - Communication with Vickie Driver regarding the February trial date and related bankruptcy issues.	CWM	0.40	\$425.00	\$170.00
	Draft/revise Revise brief of sites and voluminous records for citations.	DOP	8.30	\$295.00	\$2,448.50
Sep -14-23	Draft/revise portions of brief regarding Biden case. Review of cases cited by Biden and review of file to establish similarities.	DOP	7.40	\$295.00	\$2,183.00
Sep -15-23	Draft/revise continued draft of brief and review of cases for freedom of speech and death penalty sanctions.	DOP	9.20	\$295.00	\$2,714.00
Sep -18-23	Draft/revise Document review and case law related to public figures	DOP	8.30	\$295.00	\$2,448.50

Sep -19-23	Draft/revise - Revisions to the IIED section of the appellate brief and follow-up communication with Andino Reynal regarding same.	CWM	1.80	\$425.00	\$765.00
	Draft/revise RR for record cites for brief.	DOP	8.20	\$295.00	\$2,419.00
Sep -20-23	Review/analyze - Research at University of Houston Law Library to obtain the legal treatises and other legislative history materials needed for multiple arguments we're making in our appellate brief regarding multiple legal issues because such materials are not available online.	CWM	3.30	\$425.00	\$1,402.50
	Draft/revise Review Info Wars employees depositions for record cites for brief.	DOP	8.30	\$295.00	\$2,448.50
Sep -21-23	Review/analyze - Complete offsite research needed in the University of Houston Law Library of multiple legal treatises and other legal materials not available through online research for our appellate arguments regarding the interplay between the First Amendment to the US Constitution regarding free speech and death penalty sanction orders entered in this case, the constitutionality of the Texas punitive damage limitations and the legislative history of same.	CWM	3.60	\$425.00	\$1,530.00
	Draft/revise Continued review of Info wars employees depositions for record cites for brief.	DOP	8.30	\$295.00	\$2,448.50
Sep -22-23	Draft/revise Continued review of Receipt and review of for cites in the brief and for arguments in general.	DOP	6.20	\$295.00	\$1,829.00
Sep -23-23	Draft/revise - Work on the latest draft of the Alex Jones brief concerning IIED appellate points and the punitive damage cap section and forward comments to Co-counsel for incorporation into the next draft.	CWM	1.80	\$425.00	\$765.00
Sep -24-23	Draft/revise - Work on the latest draft of our appellate brief regarding the death penalty sanctions and First Amendment issues and provide comments to Mr. Oppermann for his continued revisions for the next draft.	CWM	1.40	\$425.00	\$595.00

Sep -25-23	Draft/revise Reverie Appellant record for common issues with Bailey and Missouri v Biden.	DOP	8.20	\$295.00	\$2,419.00
Sep -26-23	Draft/revise Continued draft of Brief for exchange with counsel for review	DOP	8.30	\$295.00	\$2,448.50
Sep -27-23	Review/analyze - Location of multiple record sites regarding all prior hearings on sanctions motions brought by Plaintiffs against our clients in order to actually develop the brief arguments concerning the entry of multiple sanctions motions and factual proof of the Court's failure to follow Texas law regarding the imposition of sanctions including revisions to the legal standards section addressing Texas authority defining the parameters of proper death penalty sanctions.	CWM	2.60	\$425.00	\$1,105.00
	Draft/revise Continued search for relevant and recent case law for addition to table of authorities.	DOP	8.40	\$295.00	\$2,478.00
Sep -28-23	Draft/revise Death Penalty sanctions standard and revision of free speech sections.	DOP	8.40	\$295.00	\$2,478.00
Sep -29-23	Communicate (with outside counsel) - Meeting with Andino, Reynal and the appellate team to discuss numerous status and strategy issues concerning multiple sections of the appellate brief and continue to divide responsibility for drafting and revisions among different attorneys and make additional assignments for the upcoming week.	CWM	0.50	\$425.00	\$212.50
	Draft/revise - Extensive work on Section 1 of our appellate brief concerning death penalty sanctions including the violations of Texas law regarding the impositions of this discovery sanction and the related First Amendment implications under the US Constitution.	CWM	2.20	\$425.00	\$935.00
	Draft/revise Review of materials regarding evidence of documents exchanged with plaintiffs for record cites in brief.	DOP	8.30	\$295.00	\$2,448.50
	Draft/revise Participated in Appellant team meeting. Began collecting additional cites identified by team for multiple sections of the brief	DOP	6.40	\$295.00	\$1,888.00

Sep -30-23	Draft/revise - Revise the latest draft of the section of the appellate brief regarding joint several liability for exemplary damages and forward my latest suggestions and comments for additional drafting to Andino and the appellate team for their consideration.	CWM	0.90	\$425.00	\$382.50
	Draft/revise - Significant revisions to our death penalty sanctions/First Amendment section of the appellate brief including extensive revisions and numerous comments to Mr. Oppermann to incorporate into our next draft.	CWM	1.80	\$425.00	\$765.00
	Draft/revise - Make additional revisions to the section of the appellate brief dealing with the trial courts allowing Plaintiffs to amend their pleadings in order to assert a cause of action to supersede the punitive damage cap under Texas law and forward my comments to Mr. Reynal for incorporation.	CWM	1.20	\$425.00	\$510.00
	Draft/revise - Make multiple revisions and suggested additions to the latest draft of the appellate brief section dealing with Plaintiffs' claims for intentional infliction of emotional distress including forward all comments and suggested revisions to Andino Reynal and the appellate team.	CWM	1.30	\$425.00	\$552.50
	Draft/revise - Make revisions to the latest draft of the section of the appellate brief dealing with Plaintiffs' failure to bifurcate punitive damages at trial including forward my comments and suggestions to Andino Reynal and the appellate team for their incorporation and additional drafting this week	CWM	1.00	\$425.00	\$425.00
Totals			210.20		\$66,000.00

Fee Summary:

		Hours	Effective Rate	Amount
Christopher W. Martin	CWM	30.70	\$425.00	\$13,047.50
Dave Oppermann	DOP	179.50	\$295.00	\$52,952.50

DISBURSEMENTS

		Amount
Sep -12-2023	Litigation support vendors Velva L. Price, District Clerk, for Supplemental Clerk Records	\$847.00
Sep -14-2023	Litigation support vendors Federal Express, Invoice 8-261-62166, Priority Overnight delivery to Velva L. Price	\$47.42

Sep -28-2023	Litigation support vendors Chavela V. Crain, Transcript regarding Hearing on Motion for Expedited Discovery and Motion for Protective Order	\$270.00
Sep -30-2023	Litigation support vendors DocuCopy Copy Services for 645 bw @ 0.15 and 5 di @ 0.12	\$97.35
Total Disbursements		\$1,261.77
Total Fees & Disbursements		\$67,261.77
Previous Balance		\$315,482.52
Total Receipts		\$0.00
Balance Due Now		\$382,744.29